



January 6, 2010

*Via Electronic Filing*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: WT Docket No. 06-150; PS Docket No. 06-229; GN Docket No. 09-51  
*Ex Parte Presentation*

Dear Ms. Dortch:

MetroPCS Communications, Inc., Sprint Nextel Corporation, T-Mobile USA, Inc., Clearwire Corporation, Rural Telecommunications Group, Inc., and Access Spectrum, LLC (Coalition for 4G in America) urge the Commission to take action in the above-referenced proceedings consistent with the principles described below. By following these principles, the Commission will be able to auction the Upper 700 MHz D Block for commercial use as soon as possible and thereby provide much-needed additional commercial spectrum to promote widespread availability of competitive broadband services. The principles also provide an incentive-based framework for the Commission, acting under its existing statutory authority, to promote viable, effective public-private partnerships on all spectrum licensed by the Commission, not just the 700 MHz D Block, to meet the public safety community's need for nationwide, interoperable wireless broadband communications.

The Coalition for 4G in America urges the Commission to include these principles in its National Broadband Plan and to take action in its pending rulemaking proceedings consistent with the following principles:

1. *The FCC Should Move As Soon As Possible to Auction the Upper 700 MHz D-Block for Commercial Use.* The FCC should auction the Upper 700 MHz D-Block for commercial use as soon as possible and structure the auction to promote a fair distribution of 700 MHz band licenses while at the same time seeking to ensure that such policy does not inhibit public safety's ability to enter into public/private partnerships.
2. *The FCC Should Promote Public Safety Broadband Through Incentive-Based, Commercially Viable Public-Private Partnerships That Are Technology, Spectrum Band, and Provider Neutral.* The FCC should promote public-private partnerships not through command and control regulation on a particular block of spectrum, but rather by establishing incentives for commercial operators to enter into public-private partnerships to meet public safety broadband needs. This incentive-based approach should be technology-, spectrum band-, and provider-neutral, and promote the FCC's goal of nationwide interoperability.
3. *The FCC Should Combine the A and D Blocks to Promote Spectrum Efficiency and Enhance Incentives for Creating a Public-Private Partnership.* Adding an additional 2 MHz to the 10 MHz D Block would increase the amount of spectrum the auction winner would receive and consequently attract greater interest in the auction and in a public-private partnership and harmonize the A/D/Public Safety blocks with other 700 MHz spectrum blocks helping create economies of scale.
4. *The FCC Should Ensure that Public Safety Narrowband Operations in the 700 MHz Band are Protected from Interference.* Public safety 700 MHz narrowband operations remain important for public safety communications and must be protected from harmful interference.

Pursuant to section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed with the Office of the Secretary.

Respectfully submitted,

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